



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SMF/KCB/DEL/GK/NG
F. #2018R01401

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 26, 2024

By E-mail and ECF

Jennifer Ann Bonjean
Bonjean Law Group, PLLC
303 Van Brunt Street
1st Floor
Brooklyn, New York 11231
(718) 875-1850

Imran H. Ansari, Esq.
Michael T. Jaccarino, Esq.
Arthur L. Aidala, Esq.
Aidala, Berutna & Kamins PC
546 Fifth Avenue, 6th Floor
New York, New York 10036
(212) 486-0011

Counsel for Nicole Daedone

Counsel for Rachel Cherwitz

Re: United States v. Rachel Cherwitz and Nicole Daedone
Criminal Docket No. 23-146 (DG)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery is being produced to you pursuant to the Protective Order in the above-captioned matter, entered on November 15, 2024. ECF Dkt. No. 207.

I. The Government's Discovery

A. Documents and Tangible Objects

- Various business records certifications and correspondence from financial institutions and other corporations, including Bank of America, Intuit, Goldman Sachs and Salesforce, Bates numbered ONETASTE00269454 – ONETASTE00269463.

The government has requested business records certifications from additional financial institutions and corporations, and will provide such records as soon as they are received.

You may examine physical evidence discoverable under Rule 16, including original documents, by calling us to arrange a mutually convenient time.

The government renews its request for reciprocal discovery from the defendants. Please note that the defendants' obligations under Fed. R. Crim. P. 16(b) include identification of "all non-impeachment exhibits [the defendants] intend to use in their defense at trial, whether the exhibits will be introduced through a government witness or a witness called by a Defendant." United States v. Napout, No. 15-CR-252 (PKC), 2017 WL 6375729, at *7 (E.D.N.Y. Dec. 12, 2017); accord United States v. Smothers, No. 20-CR-213 (KAM), 2023 WL 348870, at *22 (E.D.N.Y. Jan. 20, 2023).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
Sean Fern
Kayla Bensing
Gillian Kassner
Devon Lash
Nina Gupta
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (DG) (by ECF) (without enclosures)